

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

ELITE HOME CARE, LLC	
v.	
ELITE ANGELS HOMECARE LLC	Case No. 3:24-cv-04554-JDA

**CONSENT MOTION TO EXTEND TIME FOR DEFENDANT
TO FILE ITS RESPONSIVE PLEADING**

Plaintiff Elite Home Care, LLC (“Plaintiff”) and Defendant Elite Angels Homecare LLC (“Defendant”) respectfully submit this Joint Motion to Extend Time for Defendant to File its Responsive Pleading. In further support of this Motion, the parties state as follows:

Good cause exists because the parties are actively discussing settlement of the matter. Possible final settlement would require activities that will take time to resolve, even with party diligence. Moreover, the timeline on some of the activities is outside of the parties’ immediate control. The parties believe these issues can be resolved without Court intervention with a reasonable amount of time.

Accordingly, the parties respectfully request that the Court allow Defendant to file its responsive pleading on or before December 9, 2024. A Proposed Order reflecting the foregoing is attached.

* * *

Respectfully Submitted,

/s/ Eric Menhart

Eric Menhart, Esq. *

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* Pending Admission *Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2024, a copy of the foregoing was served via the Court's electronic filing system

/s/ Rachel G. McConoughey

Rachel G. McConoughey, Esq.